STATE OF CALIFORNIA

BUSINESS, TRANSPORTATION AND HOUSING AGENCY DEPARTMENT OF CORPORATIONS

TO: Brendan M. Flaherty, Owner Warrior ATV Golf, LLC 15 Mason, Suite A Irvine, CA 92618

DESIST AND REFRAIN ORDER

(For violation of section 25110 of the Corporations Code)

The California Corporations Commissioner finds that:

- Warrior ATV Golf, LLC ("Warrior") is a California limited liability company
 ("LLC") organized on June 22, 2005. It maintains a principal place of business at 15 Mason, Suite A,
 Irvine, California 92618.
- 2. At all relevant times, Brendan M. Flaherty ("Flaherty") was a control person of Warrior ATV Golf, LLC. According to Warrior's Confidential Private Placement Offering Memorandum ("PPM") dated September 15, 2004, Flaherty is the sole owner of Warrior Development, Inc. and majority owner of Warrior Custom Golf, Inc. Warrior Development, Inc. and Warrior Custom Golf, Inc. are the managers of Warrior ATV Golf, LLC.
- 3. According to the PPM, Warrior was formed to create an all-terrain golf course in Southern California. This golf course would be unique, appealing to golfers as well as off-road enthusiasts.
- 4. The PPM offers securities in the form of "units" in the limited liability company valued at \$750 each. The minimum investment is 20 units, or \$15,000.

- total of \$13,707,000.00 in Warrior. Of those investors, 218 are California residents who invested a total of \$4,791,000.
- 7. These securities were offered or sold in this state in issuer transactions. The Department of Corporations has not issued a permit or other form of qualification authorizing any person to offer or sell these securities in this state.
- 8. On October 13, 2004, pursuant to California Corporations Code section 25102.1(d), Warrior filed a Form D with the California Department of Corporations. The Form D claimed Warrior was exempt from registration pursuant to SEC Rule 506.
- 9. However, the exemption under Corporations Code section 25102.1(d) is not available to Warrior as the result of the general solicitations, in the form of postcard mailings, used to offer and sell the LLC interests.

Based upon the foregoing findings, the California Corporations Commissioner is of the opinion that the interests in a limited liability company that are being or have been offered or sold by Brendan M. Flaherty and Warrior ATV Golf, LLC are securities subject to qualification under the California Corporate Securities Law of 1968 and are being or have been offered or sold without being qualified in violation of Corporations Code section 25110. Pursuant to section 25532 of the Corporate Securities Law of 1968, Brendan M. Flaherty and Warrior ATV Golf, LLC are hereby ordered to desist and refrain from the further offer or sale in the State of California of securities, including but not

1	limited to interests in a limited liability company, unless and until qualification has been made under
2	the law or unless exempt.
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4	This Order is necessary, in the public interest, for the protection of investors and consistent
5	with the purposes, policies, and provisions of the Corporate Securities Law of 1968.
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7	Dated: May 9, 2008
8	Los Angeles, California
9	PRESTON DuFAUCHARD California Corporations Commissioner
10	Camornia Corporations Commissioner
11	By:
12	ALAN S. WEINGER Lead Corporations Counsel
13	Enforcement Division
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